

Wedoff, Carl N.

From: Reece Dameron <rdameron@aminillc.com>
Sent: Thursday, December 29, 2022 11:54 AM
To: Wedoff, Carl N.
Cc: Allen, Angela M.; Williams, William A.
Subject: RE: Levin v. Javeri, Case No. 20-01054
Attachments: Javeri Draft Scheduling Order.doc

External Email - Do Not Click Links or Attachments Unless You Know They Are Safe

Carl,

We agreed to produce certain documents by January 6 and we are going to keep to that schedule. We can't agree to the proposed third stipulation. You are just asking us to agree to produce documents you previously requested. This doesn't make sense as attachment discovery and our position hasn't changed since the conference. If you have a proposal for other discovery relating to the existing stipulation, please send it over and we will consider it.

I have attached our proposed scheduling order. Let me know if you have any changes.

Thanks,

Reece

From: Wedoff, Carl N. <CWedoff@jenner.com>
Sent: Thursday, December 29, 2022 10:48 AM
To: Reece Dameron <rdameron@aminillc.com>
Cc: Allen, Angela M. <AAllen@jenner.com>; Williams, William A. <WWilliams@jenner.com>
Subject: RE: Levin v. Javeri, Case No. 20-01054

Hi Reece,

I have received no response to my emails sent December 18 and December 23. If we do not hear back by January 4, we intend to proceed with a motion.

Thanks,
Carl

From: Wedoff, Carl N.
Sent: Friday, December 23, 2022 2:23 PM
To: 'Reece Dameron' <rdameron@aminillc.com>
Cc: Allen, Angela M. <AAllen@jenner.com>; Williams, William A. <WWilliams@jenner.com>
Subject: RE: Levin v. Javeri, Case No. 20-01054

Reece,

Happy holidays. Please let me know if your client is amenable to the attached. I am available to discuss.

Thanks,
Carl

From: Wedoff, Carl N.
Sent: Sunday, December 18, 2022 7:55 PM
To: Reece Dameron <rdameron@aminillc.com>
Cc: Allen, Angela M. <AAllen@jenner.com>; Williams, William A. <WWilliams@jenner.com>
Subject: Levin v. Javeri, Case No. 20-01054

Settlement Correspondence Subject to Fed. R. Evid. 408

Hi Reece,

Please find attached a stipulation that would clarify that Ami Javeri is subject to discovery of her attachable assets. As Judge Lane explained during the December 14 hearing, he intends to authorize such discovery, and we think it is unnecessary for either of us to burden him with further, unnecessary motion practice. If you have comments or questions, we are happy to discuss.

Thanks,
Carl

Carl N. Wedoff

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